



January 12th, 2024

Via Electronic Mail:

Hon. P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

and

Jacob M. Kaplan
Baker McKenzie LLP
452 Fifth Avenue
New York, New York 10018
Email: jacob.kaplan@bakermckenzie.com

Re: General Electric Company vs. Global Fiberglass Solutions of Texas LLC

Case 1:23-cv-08346-PKC

Dear Judge Castel:

Thank you for granting Global Fiberglass Solutions of Texas, LLC (GFS) additional time to find representation and prepare for the pretrial conference scheduled for later this month.

Despite discussing the case with counsel, and being informed that GFS has solid grounds to a) explore an out of court resolution with the plaintiff or b) counter the complaint in court and possibly enter a motion for dismissal, GFS has not been able to get a commitment from counsel to represent GFS in this case. The expectation is that a trial in this matter will take a lot of legal work and GFS has not been able to raise sufficient funds to convince counsel that they will get paid for their work. There are still discussions going on to meet the next deadline (January 15th), but as of today there is no engagement letter in place.

From what GFS understands, GFS is barred from representing itself in this case without legal representation. To explore other options, GFS has asked the New York Legal Assistance Group (NYLAG) for assistance, as suggested by the response email received from the Pro Se Intake Unit of the United States District Court for the Southern District of New York. GFS is awaiting a response, but the NYLAG

appears to have limited resources and is “experiencing a high volume of cases.” GFS is hoping that the NYLAG will be able to support GFS and/or provide contacts for potential Pro Bono services.

Other efforts to raise the funds continue, but unfortunately, we are finding that the investors we have been in talks with so far have been reluctant to support GFS while this complaint is unresolved.

GFS is a small, minority owned company dedicated to helping solve the waste problem of the wind energy industry, dominated by large corporations, such as the Plaintiff. GFS has developed a solution for these problems and this complaint runs the risk of crushing well over a decade worth of work that went into it.

Based on the foregoing, we respectfully request to advise if an exception can be granted for GFS to represent itself in this matter, at least until we can explore other options with the NYLAG, Pro Bono attorneys or even through Crowd Funding, as was recently suggested to GFS.

Please do not hesitate to reach out to the undersigned with any further questions or concerns.

Sincerely,



Ronald Albrecht, Ph.D.
for Global Fiberglass Solutions of Texas, LLC
Email: ronald@globalfiberglass.com
Phone: 425-445-1352